

WILLIAM A. ISAACSON (*Pro hac vice*)  
(wisaacson@bsflp.com)  
STACEY K. GRIGSBY (*Pro hac vice*)  
(sgrigsby@bsflp.com)  
NICHOLAS WIDNELL (*Pro hac vice*)  
(nwidnell@bsflp.com)  
BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, NW  
Washington, DC 20005  
Tel: (202) 237-2727; Fax: (202) 237-6131

RICHARD J. POCKER #3568  
(rpocker@bsflp.com)  
BOIES SCHILLER FLEXNER LLP  
300 South Fourth Street, Suite 800  
Las Vegas, Nevada 89101  
Tel: (702) 382-7300; Fax: (702) 382-2755

DONALD J. CAMPBELL #1216  
(djcc@campbellandwilliams.com)  
J. COLBY WILLIAMS #5549  
(jcw@campbellandwilliams.com)  
CAMPBELL & WILLIAMS  
700 South 7th Street  
Las Vegas, Nevada 89101  
Tel: (702) 382-5222; Fax: (702) 382-0540

*Attorneys for Defendant Zuffa, LLC, d/b/a  
Ultimate Fighting Championship and UFC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Cung Le, Nathan Mr. Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF STACEY K.  
GRIGSBY IN SUPPORT OF ZUFFA,  
LLC'S MOTION TO SEAL  
PORTIONS OF ZUFFA'S  
OPPOSITION TO PLAINTIFFS'  
MOTION TO COMPEL  
DEFENDANT TO PRODUCE A LOG  
OF COMMUNICATIONS FOR DANA  
WHITE'S DISCOVERABLE  
TELEPHONE NUMBERS AND  
ELECTRONIC COMMUNICATION  
DEVICES AND DIRECTING  
DEFENDANT TO SUBMIT AN  
INVENTORY OF ELECTRONIC  
COMMUNICATION DEVICES AND  
RELATED DOCUMENTS (ECF No.  
395)**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am over 21 years old and have personal knowledge of the information in this  
3 declaration. I am a member in good standing of the bars of the District of Columbia and the state of  
4 New York. I am admitted pro hac vice to practice before this Court. I am a partner in the law firm  
5 Boies Schiller Flexner LLP, counsel for Zuffa, LLC (“Zuffa”) in the above captioned action in the  
6 U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No. 2:15-cv-01045-RFP-PAL.

7 2. Except where otherwise stated, based on my review of the files, records, and  
8 communications in this case, I have personal knowledge of the facts set forth in this Declaration and,  
9 if called to testify, could and would testify competently to those facts under oath.

10 3. I make this declaration in support of Zuffa’s Motion to Seal Portions of Zuffa’s  
11 Opposition to Plaintiffs’ Motion to Compel Defendant to Produce a Log of Communications for  
12 Dana White’s Discoverable Telephone Numbers and Electronic Communication Devices and  
13 Directing Defendant to Submit an Inventory of Electronic Communication Devices and Related  
14 Documents (ECF No. 395) (“Motion to Seal”).

15 4. Zuffa seeks to seal limited portions of exhibits and one exhibit to the Declaration of  
16 Stacey K. Grigsby in Support of Zuffa’s Opposition to Zuffa’s Opposition to Plaintiffs’ Motion to  
17 Compel Defendant to Produce a Log of Communications for Dana White’s Discoverable Telephone  
18 Numbers and Electronic Communication Devices and Directing Defendant to Submit an Inventory  
19 of Electronic Communication Devices and Related Documents (“Grigsby Decl.”).

20 5. Federal Rule of Civil Procedure 26(c) provides that the Court may “issue an order to  
21 protect a party or person from annoyance, embarrassment, oppression or undue burden or expense”  
22 by “requiring that a trade secret or other confidential research, development, or commercial  
23 information not be revealed or be revealed only in a specific way.” Documents filed in connection  
24 with a non-dispositive motion like the Motion to Compel may be sealed if the party seeking to seal  
25 the documents makes a “particularized showing” under the “good cause” standard of Rule 26(c).  
26 *Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1180 (9th Cir. 2006) (citation and internal  
27 quotation marks omitted).

6. I understand that Stroz Friedberg does not publicly disclose pricing information regarding its services and that pricing information is kept confidential as between Stroz Friedberg and its clients.

7. The contracts between Zuffa and its e-discovery vendors contain confidentiality provisions, which limits the public disclosure of information concerning work performed under the contracts.

8. I further understand that Zuffa has a policy of not disclosing its confidential internal business practices, including the policies and procedures it uses with respect to litigation holds and Mandatory Preservation Notices. In addition, this internal communication is a highly confidential communication between Zuffa's in-house counsel and Zuffa employees and I understand that Zuffa zealously guards these communications and treats them as highly confidential.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed this 24th day of May, 2017, in Washington, DC.

/s/ Stacey K. Grigsby

Stacey K. Grigsby